

MEMO ENDORSED**THE CITY OF NEW YORK
LAW DEPARTMENT****MURIEL GOODE-TRUFANT**
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May 28, 2025

BY ECF

Honorable Andrew L. Carter, Jr.
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Anton Liverpool v. City of New York, et al.,
20 Civ. 4629 (ALC) (OTW)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, the Corporation Counsel of the City of New York, and the attorney representing defendants City of New York, Darrien Lewis, and Jacob Rivers (“defendants”) in the above-referenced matter.¹ I write to respectfully request a one (1) week extension of time to file defendants’ motion to dismiss, from June 12, 2025 to June 20, 2025. This is the first request of this kind and the undersigned was not able to speak with plaintiff regarding his consent to this request due to his incarcerated status.

As the Court is aware, on May 22, 2025, Your Honor set a briefing schedule for defendants’ anticipated motion to dismiss setting the deadline for the defendants to file their motion to dismiss by June 12, 2025; for plaintiff to file his Opposition by June 26, 2025; and for defendants to file their reply by July 3, 2025. See ECF No. 182.

The reason for the instant request is because the undersigned will be out of the office from May 29, 2025 until June 6, 2025 and additional time is needed to sufficiently prepare defendants’ papers. Should the Court be inclined to grant this request, defendants respectfully submit the following proposed amended briefing schedule:

¹ As indicated in the Suggestion of Death filed on the docket on June 10, 2022, defendant Hermantin Surpris passed away on or about October 8, 2021. See ECF No. 84.

- June 20, 2025: Deadline for defendants to serve and file defendants' motion to dismiss;
- July 7, 2025: Deadline for plaintiff to serve and file his opposition;
- July 14, 2025: Deadline for defendants to serve and file their reply.

For these reasons, the undersigned respectfully requests a one (1) week extension of time to file defendants' motion to dismiss, from June 12, 2025, to June 20, 2025, and a corresponding extension of time for the remaining motion papers as set forth above.

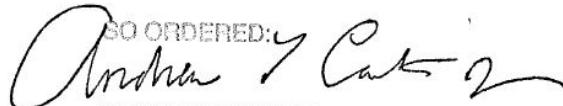
Defendants thank the Court for its time and consideration in this matter.

Respectfully submitted,

/s/ Edward Reilingh
Edward Reilingh
Assistant Corporation Counsel
Special Federal Litigation Division

cc: **BY FIRST-CLASS MAIL**

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Plaintiff pro se
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SO ORDERED:
HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

May 29, 2025
New York, NY